to service address, Telcordia states only that it was able to populate an order with the information in a Pre-order/Order process simulator. It does not state that it was able to transmit the information successfully to SWBT, much less that the information was accurately parsed so that the order was provisioned at the correct address. Telcordia also does not provide examples of the addresses it ostensibly parsed, so there is no way to know whether its claim applies to more complicated addresses where, for example, a street address number is not part of the address, or a word such as Street is actually part of the street name, rather than the thoroughfare. Finally, it is important to note that Telcordia designed the SWBT legacy systems that contain the address information it is now parsing; thus, like SWBT, it has a significant head start over CLECs in attempting to parse this information.

27. SWBT contends that two CLECs, Sage and Navigator, have been able to use SWBT's documentation to parse address information. However, the letters SWBT attaches from Sage and Navigator both refer to continued problems with address validation. Sage does not state what percentage of addresses it has been able to parse successfully. Navigator states only that it is "able to process orders between 80 and 90% of the time." Ham Supp. Aff. att. B. This is not a particularly high success rate. Moreover, it is MCI WorldCom's understanding that Navigator has not even attempted to integrate address functionality. Thus, Navigator's experience shows nothing about the ability of CLECs to parse the data provided in concatenated format. The fact that Navigator is nonetheless experiencing a 10 to 20% failure rate suggests that even with respect to pre-order data other than address, integration may not be smooth.

28. SWBT contends that the address errors experienced by Sage and Navigator "are not a result of using parsed address information per se, but of using parsed CSR address information obtained from the CSR, which was not found to be a valid address upon editing of the LSR." Ham Supp. Aff. ¶ 21. In other words, according to SWBT, Sage and Navigator correctly parsed the addresses on the CSRs and used them to populate orders but the addresses from the CSRs turned out to be invalid addresses. The only way this would be so, however, is if SWBT edited the LSR against a different database (presumably PREMIS) than the database from which the CSR was drawn (CRIS). This points to a separate problem in SWBT's OSS – the existence of database mismatches, which we will discuss further below. The point here is that SWBT provides no basis for its contention that all of the address errors experienced by Sage and Navigator are attributable to database mismatches. Although that is likely true for some of the errors, it is almost certain that others are attributable to parsing problems. It is hard to believe otherwise given that SWBT simply does not provide all of the rules needed to parse addresses.

29. Moreover, Sage and Navigator do not state what their mix of orders is, and it is likely that the mix primarily includes very simple residential orders (houses rather than apartments) and that the reject rate would be higher if Sage and Navigator were transmitting addresses from multi-tenant buildings or industrial complexes or with non-routine street names, numbers etc. While CLECs may be able to write a parsing routine with some degree of accuracy for simple residential addresses, even this would require significant guesswork as to proper parsing rules. The failure rate would likely be quite high for CLECs that

routinely transmit more complex addresses. As explained above, SWBT has not provided any information as to how to parse the fields Floor, Room and Building.

30. Moreover, Sage and Navigator do not state that they have integrated pre-ordering and ordering with respect to directory listing orders. A customer's directory name and address is accessed via a combination of the CSR and directory listing pre-order functions. As we have explained, SWBT has not provided any rules explaining how to parse the twelve fields that are part of a customer's Directory Name. Integration of pre-ordering and ordering for directory listing remains impossible.

31. Given the absence of complete parsing rules, SWBT's claim that CLECs can effectively integrate pre-ordering and ordering cannot be sustained. Certainly, CLECs should not have to guess at parsing rules, and rather than doing so, MCI WorldCom is currently visually parsing address information and re-typing that information onto each order, an approach that is not sustainable at commercial volumes.

32. Of course, there would be no controversy as to whether CLECs can parse CSRs themselves if SWBT simply did what Bell Atlantic did in New York and provided fully parsed CSRs. It should not be difficult for SWBT to do this. On May 27, SWBT plans to implement a new process in which CLECs will no longer have to submit service addresses on migration orders. Under this "Service Address Proposal," once SWBT receives the migration orders, SWBT will populate the orders with the customers' service addresses which SWBT will obtain by looking up the addresses in CRIS, the database in which the CSRs reside. In order to populate the addresses, SWBT will presumably have to parse them. If it is able to do this after a CLEC has submitted an order, it should be

able to do so prior to transmitting the CSR to the CLEC in the first place. Indeed, SWBT claims to parse the address information it provides through the address validation pre-order function; thus, it should be able to parse address information provided to CLECs on CSRs.

33. At a Texas PUC meeting on April 17, SWBT promised to do just this – provide fully parsed CSRs – but not until June 2001. This is far too late. While SWBT's promise is an extremely welcome development, CLECs need fully parsed CSRs now in order to begin transmitting commercial volumes of orders. Moreover, SWBT should re-affirm its commitment here. At the April 17 meeting, although SWBT seemed to unambiguously commit to providing fully parsed CSRs, in doing so it also referred to the OSS Plan of Record for SBC's thirteen state region. But SWBT may later contend that the Plan of Record does not make such a commitment. The Plan of Record states that parsed information will be provided "based on the availability of information" in the back-end systems, which SWBT may contends suggests that if the information in the back-end has not been parsed, it will not be provided in parsed format. SBC/Ameritech Plan of Record, p. 34 (ex. 1 to this Declaration). If that is all that SWBT is committing to, the commitment is meaningless, since most of the addresses in SWBT's back-end systems are not parsed. SWBT should reaffirm its commitment to provide fully parsed CSRs in all circumstances and promise to meet that commitment quickly, not in June 2001.

3. SWBT's Service Address Proposal Will Not Resolve All of the Difficulties Caused by its Failure to Provide Fully Parsed CSRs.

34. SWBT suggests that its Service Address Proposal will eliminate the problems caused by use of concatenated fields on the CSR. Ham Supp. Aff. ¶¶ 22-27. This is not so, however. While SWBT's proposal to eliminate the requirement that CLECs transmit addresses on migration orders is one that MCI WorldCom has strongly supported – indeed, one that MCI WorldCom proposed -- CLECs will still need fully parsed CSRs.

35. CLECs need to maintain fielded address information in their back-end systems even if they do not have to transmit that information to SWBT on migration orders. They will therefore need to type that information into their back-end systems. CLECs need that fielded address information for several purposes. First, when CLEC customers request a change in their features, such as when a customer decides to add call waiting, CLECs must transmit the customer's fielded service address to SWBT. SWBT will require submission of addresses on such orders even after implementation of its Service Address Proposal. Orders to change customer features are quite common. As we have previously explained, in New York, MCI WorldCom has been submitting orders to change a customer's service for more than 15% of its customers each month. McMillon, Sivori & Lichtenberg Reply Decl. ¶ 52.

36. In addition to subsequent orders, CLECs must maintain fielded address information in order to transmit trouble tickets for customers, because a customer's service address must be provided on each trouble ticket. CLECs also must maintain fielded address

information in their systems because they need a customer's address in order to bill the customer.

37. Thus, when customers migrate to CLECs, CLECs will need to re-type a customer's service address into their own systems in order to be able to transmit subsequent orders and trouble tickets for the customer, as well as to bill the customer. This re-typing wastes significant resources. Moreover, the subsequent request must match all data in SWBT's files exactly or it will be rejected.

38. In addition, SWBT's Service Address Proposal will not eliminate CLECs' need to transmit service addresses even on all initial customer orders. CLECs will have to transmit service addresses on migration orders for xDSL-based loops, for example. Ham Supp. Aff. ¶ 25. CLECs will also have to transmit service addresses on every order that SWBT considers to be a new connect -- even if the customer already has a CSR. Thus, if a CLEC places a migration order for a customer, the CLEC will have to include the customer's fielded service address if the order includes a request for a second line for that customer (a new line). Similarly, if an existing CLEC customer orders a second line, the CLEC will have to transmit the service address. Requests for second lines are a common type of order.

39. CLECs will therefore continue to need fielded service addresses even after implementation of SWBT's Service Address Proposal. They will also continue to need fielded directory information, including directory names, directory addresses and directory delivery information. Even after implementation of SWBT's service address proposal, CLECs will have to transmit a customer's existing directory listing and

proposed new listing whenever a CLEC places an order to change a customer's directory listing (as well as delivery address in some instances).

40. Finally, SWBT's Service Address Proposal is just that -- a proposal. It has not yet been implemented. Although the proposal will likely lead to a significant reduction in rejects of migration orders, it may cause other problems. The exact ramifications of any systems change are never known until it is tested and implemented. As we discuss further below, there are some problems that are quite likely to result from SWBT's planned change. SWBT should not be able to claim credit for hypothetical future advantages of its proposal while avoiding blame for any negative consequences simply because the proposal has yet to take effect.

C. Database Mismatches Also Preclude Effective Integration of Pre-ordering and Ordering

41. Apart from the absence of fully parsed CSRs, mismatches in SWBT's different address databases preclude effective integration of its interfaces. An address obtained from the CSR, even if parsed correctly, will often be rejected at the ordering stage because SWBT relies on the PREMIS address at that stage in addition to the CRIS address from which CSRs are drawn. The addresses in CRIS and PREMIS frequently do not match. Indeed, as we explained above, SWBT seems to attribute the address rejects experienced by Sage and Navigator to mismatches between the addresses they are obtaining from CRIS and the PREMIS addresses against which SWBT is conducting downstream edits. We have previously explained that other CLECs have estimated the number of database mismatches to be quite high.

42. The early experience from MCI WorldCom's launch seems to confirm the prevalence of address mismatches. MCI WorlCom has received numerous address rejects from different stages of SWBT's process. Of the address rejects, 78% have the code SD, which stands for SORD reject, and 22% have the code MR, which stands for manual reject due to the order not being MOGable. If the address rejects were all resulting from typing errors, one would expect that they would all occur at the same stage in the process.

43. We have also previously explained that address mismatches can lead not only to rejects, but also to loss of dial tone or provisioning of service at an incorrect address. McMillon & Sivori Decl. ¶¶ 68, 100; McMillon, Sivori & Lichtenberg Reply Decl. ¶ 21. In fact, in an accessible letter on January 26, SWBT discussed a need for "a new address validation edit to ensure that the correct end user is being converted." McMillon & Sivori Decl. att. 6. CLECs subsequently rejected the proposed edit because it would not have fixed the problem. SWBT has not proposed any alternative fix.

44. SWBT suggests that the problems caused by database mismatches could be avoided if CLECs took addresses from the CSR and then validated them using the address validation function. Ham Supp. Aff. ¶ 21. But SWBT does not explain how this would avoid the problem. If an address obtained from the CSR were determined to be invalid using the address validation function (because of a mismatch with PREMIS), the CLEC would not know what address to submit. Either address would likely be rejected as mismatching one of the back-end databases, and use of the address from PREMIS could even cause the customer to lose dial tone. McMillon, Sivori & Lichtenberg Reply Decl. ¶ 21. Use of the address validation function on every order would also waste significant

time and resources by, in most cases, doubling the number of pre-order inquiries that are necessary.

45. SWBT's Service Address Proposal, as explained to CLECs, is also unlikely to cure the problems caused by database mismatches. Under that proposal, CLECs will not need to submit addresses on most migration orders. But SWBT intends to populate the orders with addresses once it receives them. SWBT will look up the addresses in its CRIS database and populate the orders, presumably by using its own parsing routine. The orders will then proceed downstream just as if CLECs had placed addresses on the orders. Thus, if the CRIS address does not match that in PREMIS, conflicts between the addresses will still cause problems downstream.

46. In an April 17 Texas PUC meeting, SWBT agreed that mismatches would continue to be a possibility. It stated that when such a mismatch occurred, SWBT would manually correct the address in CRIS to match the address in PREMIS. Of course, the addition of this manual step to the process will delay provisioning of the orders and is not compatible with processing thousands of orders on a daily basis. Moreover, if the manual process does not successfully correct the address, the mismatch will continue to lead to problems such as provisioning of service at the wrong address.

47. In addition, if SWBT does correct the address in CRIS after a CLEC has submitted an order, the address in SWBT's databases will then differ from that in the database of the CLEC that submitted the order. That is because the CLEC will have taken the address from the CSR at the pre-order stage and entered it in its own database and will not know to change the address when SWBT changes the address in CRIS. Thus, on orders after

the initial migration order, the CLEC will submit an incorrect address, presumably leading to a rejection.

48. The reality is that for SWBT to really solve its database mismatch problem it will have to clean up its databases to ensure they match. That is what Bell Atlantic did in New York with implementation of its Livewire system. That is what SWBT should do as well.

D. The Information SWBT Returns at the Pre-ordering Stage Does Not Match Information SWBT Requires at the Ordering Stage.

49. One final barrier exists to successful integration of pre-ordering and ordering. MCI WorldCom has analyzed SWBT's pre-ordering and ordering documentation to determine what will be required for successful integration assuming that the issues of parsing and database mismatches can be overcome. It has determined that the information returned at the pre-ordering stage cannot simply be populated onto orders, because SWBT's business rules differ at the two stages.

50. Business rules determine the data that can be populated on an order. For example, each field on each order form has a certain maximum length -- a certain number of characters that can be placed into that field. In addition, each field can be populated only with certain "valid values" such as specified numeric characters or letters. And the values placed in a field are given a certain meaning. Thus, the characters Ave., but not Av., may mean Avenue. Business rules also dictate whether certain information is required, optional, or prohibited. If the business rules differ at the pre-ordering and ordering stages, then the information at the pre-ordering stage will not be able to be populated directly onto an order. The BOC may return Av. at the pre-order stage, for example, but

require that Ave. be populated on an order. Or the BOC may return up to ten characters at the pre-ordering stage but accept only eight characters at the ordering stage.

51. Just such conflicts exist in SWBT's OSS. For example, with respect to the "Hunting Type Code" that CLECs must enter on LSRs for customers with the hunting feature, SWBT returns values between 1 and 4 at the pre-ordering stage. At the ordering stage, however, SWBT accepts values 1, 2, 3, 5, 6, 7 -- but not 4. Moreover, the values 2 and 3 have a different meaning at the pre-ordering and ordering stages. Thus, if SWBT returns a 2, 3 or 4 during pre-ordering, that number cannot be used during ordering. A second example involves a customer's "Terminal Number," which SWBT returns at the pre-ordering stage with up to 10 numeric characters. At the ordering stage (on the End User form), SWBT only accepts terminal numbers with 8 characters or fewer. If SWBT returns a 9 or 10 character terminal number during pre-ordering, it will not accept that number during ordering. All of this leads to rejections if pre-order information is directly populated onto an order.

52. These are not isolated examples. The business rule conflicts between pre-ordering and ordering are extensive. Conflicts exist with respect to the following fields: (1) Hunting Type Code (HNTYP); (2) Service Address Street Directional (SASD); (3) Service Address Street Name (SASN); (4) Service Address Thoroughfare (SATH); (5) Floor (FLOOR); (6) Room (ROOM); (7) City (CITY); (8) Zip Code (ZIPCODE); (9) Terminal Number (TER); (10) InterLATA Presubscription Indicator Code (PIC); (11) IntraLATA Presubscription Indicator Code (LPIC); (12) Signaling (SGNL); (13) Type of Pulsing (PULSE); (14) Directory Address Street Directional (DDASD); (15) Directory Address

Thoroughfare (DDATH); (16) Directory Address Locality (DDALOC); (17) Number of White Page Books for Annual Delivery (DIRANW); (18) Style Code (STYC); (19) Type of Account (TOA); (20)White Page Products (WPP); (21) Listed Address Street Directional (LASD); (22) Listed Address Thoroughfare (LATH), and (23) Listed Address Locality (LALOC).

53. In addition to the business rule conflicts between pre-ordering and ordering, in many instances, SWBT simply fails to return some information during pre-ordering that may be needed during ordering. SWBT's pre-order CSR response transaction does not provide the following fields applicable to ordering: (1) Service Address Descriptive Location (SADLO); (2) State (STATE & SAST); (3) Bill Name (BILLNM); (4) Service Center 1 (SC1); (5) Omit Telephone Number (OMTN); (6) Line of Information (LOI); (7) Line of Text (LTEXT); (8) Listing Text Type (LTXTY); (9) Line of Text Reference Number (LTXNUM); (10) Address Indicator (ADI); (11) Directory Sub Section (DIRSUB), and (12) Omit from Secondary Directory (OMSD). On orders on which these fields must be filled in, CLECs will have to attempt to obtain this information from a source other than SWBT's pre-ordering interfaces.

54. Neither Telcordia's "success" at integrating pre-ordering and ordering nor SWBT's citation of "successful" integration of CSR functionality by Sage and Navigator shows that the pre-ordering and ordering business rules are consistent or that SWBT returns all of the pre-ordering information needed for ordering. SWBT's documentation makes clear that this is not the case. Some of the rejects that Sage and Navigator continue to experience (all CLECs are experiencing high reject rates) likely result from these

problems. Moreover, Sage and Navigator may well be placing primarily simple orders that do not require use of some of the fields, such as hunting codes, that are a main source of conflicts. As for Telcordia, it does not state that it even analyzed possible business rule conflicts to determine whether they exist; it certainly does not explain any way of resolving such conflicts. We must also emphasize that Telcordia does not say that it transmitted any orders to SWBT, much less that it successfully transmitted a wide mix of orders.

55. SWBT must work through its business rules to eliminate conflicts between pre-ordering and ordering. It must also return all of the information needed for ordering. Until it does so, SWBT's pre-ordering and ordering interfaces will not be effectively integratable, which remains vital for CLECs to establish meaningful UNE-based competition.

II. SWBT'S THREE SERVICE ORDER PROCESS UNNECESSARILY RISKS LOSS OF DIAL TONE AND DOUBLE BILLING.

56. In User Forum meetings in December, SWBT acknowledged that its process of creating three service orders from every LSR submitted for UNE-P had been linked to a host of problems. McMillon & Sivori Decl. ¶ 112. SWBT stated that it had established a task force to evaluate possible long term solutions to eliminate these problems. Id. To date, however, SWBT has not implemented any such solutions. In fact, in an April change management meeting, SWBT stated that it had "too much else on its plate" to commit to ending the three service order process, and it did not propose any alternative solutions.

57. SWBT states that its analysis of trouble tickets on AT&T's UNE-P orders demonstrates that customers lost dial tone on "only" .7% of those orders in December and .8% in

January. Ham Supp. Aff. ¶ 31. That is far too high, however. Loss of dial tone can be devastating to a customer if, for example, the customer needs access to 911. Moreover, loss of dial tone at rates of .7 or .8% is likely to quickly destroy a CLEC's reputation in the marketplace, and, with some publicity, could turn consumers against local competition from all CLECs. No customers should lose dial tone on UNE-P orders. In New York, none of MCI WorldCom's customers are losing dial tone during conversions.

58. In addition, the percentage of customers losing dial tone is likely to escalate as ordering volumes grow. SWBT is now hand-holding service orders to ensure they remain associated, something that will no longer be possible as order volumes grow. SWBT's analysis also probably does not capture all loss of dial tone today, because customers may lose dial tone but have it restored prior to submission of a trouble ticket.

59. Loss of dial tone may diminish somewhat after implementation of SWBT's Service Address Proposal but the extent of any diminution remains unknown. SWBT's proposal will likely reduce the loss of dial tone caused by mismatches between addresses on the three service orders. However, these addresses will still not be guaranteed to match. After receiving a CLEC migration order, SWBT will look up the customer's address in CRIS and then use that to populate the C order. But SWBT informed MCI WorldCom that it populates the N and D orders with a database lookup in MESA, a weekly download of data from CRIS. It stated that if the data in CRIS changes subsequent to the download, the address on the C order, drawn from CRIS, will not match the addresses on the N and D orders, drawn from MESA. Moreover, the conclusion that the Service Address

proposal will help ensure that addresses on the three service orders match presumes that SWBT implements its proposal successfully.

60. In any event, mismatches in addresses on the three service orders are only one of multiple ways in which the three service order process can result in loss of dial tone. McMillon & Sivori Decl. ¶¶ 97-106. Lost dial tone can also result, for example, when SWBT manually processes an order and fails to place the proper code on each of the three service orders to ensure they remain associated.

61. Finally, loss of dial tone is only one of the multiple problems connected with SWBT's three service order process. CLECs have delineated problems connected with this process ranging from double billing, to disconnection of hunt groups, to problems in updating SWBT's Line Information Database. Id. ¶¶ 107-08. As discussed below, the latter problem is one that MCI WorldCom is already experiencing in the early stages of its launch and one that will presumably be unaffected by SWBT's Service Address Proposal.

III. SWBT'S LIDB PROCESS REMAINS DEFECTIVE

62. CLECs remain without an effective process for updating SWBT's Line Information Database (LIDB). LIDB is a vitally important database that contains information enabling a customer to make calling card calls, receive collect calls, ensure that calls are routed to the customer's chosen intra- and inter-LATA provider(s), and trigger branding on operator service and directory assistance calls.

63. Until January 15, 2000, SWBT provided entirely inadequate processes for CLECs to update LIDB. McMillon & Sivori Decl. ¶¶ 83-84. On January 15, SWBT for the first

time provided an effective means for CLECs to transmit LIDB updates on their initial orders. However, SWBT does not effectively update LIDB after receipt of these orders. Moreover, SWBT continues to rely on inadequate processes for CLECs to transmit LIDB updates on orders subsequent to initial orders. Thus, for example, when CLECs transmit a PIC change order for a customer, they must rely on one of these inadequate processes discussed below.

64. Early data from MCI WorldCom's launch confirms that the new process SWBT implemented in January for CLECs to update its LIDB on initial CLEC orders is not working as it should be. For initial CLEC orders, SWBT is supposed to update LIDB based on the information on the initial CLEC LSR transmitted for that customer. However, when SWBT first implemented the process, we had significant doubts that it would work as intended given SWBT's inadequate responses to MCI WorldCom questions as to how it would update LIDB after receiving the CLEC orders, responses which also suggested that the process would have a substantial manual component. McMillon & Sivori Decl. ¶ 86. We also noted that orders MCI WorldCom submitted in January to test the process confirmed our fears -- showing that branding was not being updated properly. Id. ¶ 87.

65. SWBT has not fixed the process in the intervening months. Birch Telecom has complained repeatedly at change management meetings that the process is not working properly, and MCI WorldCom's early experience with its launch confirms that this is true.

66. SWBT is incorrectly updating PIC information in LIDB on a high percentage of customer orders. MCI WorldCom checked LIDB status on 60 of the orders it submitted. On each of the 60 orders, MCI WorldCom had received a completion notice at least 48 hours prior to when it checked LIDB. On those 60 orders, MCI WorldCom was unable to access LIDB status on 9 orders. It is unclear whether LIDB has been updated at all with respect to those 9 orders.

67. Out of the 51 orders we could access, nineteen customers had incorrect information for their intraLATA and/or interLATA PIC. Three customers received AT&T rather than MCI WorldCom as their long distance carrier, one received Caprock, one received carrier number "432," and two received no PIC. Two customers were PIC'd to MCI WorldCom for their long distance carrier when they should not have received any PIC. Thus, nine customers received the incorrect long distance PIC. In addition, these nine customers, and ten others, received the wrong intraLATA PIC. Sixteen customers received SWBT as their intraLATA carrier instead of MCI WorldCom. One customer received AT&T as his intraLATA carrier instead of MCI WorldCom. One customer received MCI WorldCom as his intraLATA carrier when the customer should not have been PIC'd to anyone. One customer received no intraLATA PIC instead of MCI WorldCom.

68. This is a huge problem. When the customer receives a bill from the wrong carrier at the wrong rates, the customer likely will be upset. The customer is likely to blame the CLEC for the error and may terminate local service with the CLEC. The customer may also refuse to pay the bill. In the many instances in which SWBT is incorrectly listed as a customer's intraLATA carrier, the customer may refuse to pay SWBT's higher

intraLATA rates, leading SWBT to cut the customer off for non-payment – as Bell Atlantic has done in similar circumstances in New York. Customers are also likely to bring complaints to the PUC. Moreover, at a minimum, CLECs will lose the revenue they should have obtained when customers chose the CLEC to be their intraLATA or long distance carrier.

69. The importance of this issue can hardly be overstated. SWBT simply must fix this problem before CLECs will be able to compete in a meaningful way.

70. SWBT's failure to change the intraLATA PIC while changing other information also highlights the manual nature of its process. If the process were automated, it is doubtful that some information in LIDB would be updated while other information was not. The manual nature of SWBT's ordering process, as well as its LIDB process, will likely continue to lead to mistakes in the information that is updated in LIDB.

71. SWBT's explanation as to why MCI WorldCom cannot access some orders in LIDB also raises questions about its process. SWBT first informed MCI WorldCom that the problem was likely caused by the fact that LIDB updates are triggered by the N order (one of the three service orders created by SWBT from every UNE-P order) which does not complete until after the C and the D orders. This suggests that the problem is tied to SWBT's three service order process. However, of the 9 orders that MCI WorldCom was unable to access on April 25, all had completed by April 20 which would be a vast gap between completion of the different service orders. SWBT later suggested that the problem resulted from failure of any of the three service orders to post as a result of manual handling errors, which suggests the problem is tied to SWBT's manual processes.

This explanation makes little sense, however, since MCI WorldCom had already received completion notices on the orders, suggesting that at least one of the three service orders had completed. Whatever the ultimate explanation, SWBT's failure to correctly update LIDB is an extremely serious problem.

72. Moreover, in addition to receiving the incorrect PIC, many new MCI WorldCom customers appear to be receiving improper branding (consistent with MCI WorldCom's experience with its trial orders in January). In order to check a customer's branding, MCI WorldCom must contact the customer and ask the customer to call the operator and/or directory assistance. It has been able to do so for six customers. MCI WorldCom had received completion notices on the orders of each of these customers at least 48 hours prior to testing (and ranging up to six days prior to testing).[2/] Of these six customers, three were receiving SWBT branding on operator and directory assistance calls, one was receiving AT&T branding, and only two were properly receiving MCI WorldCom branding. New CLEC customers become confused when they hear SWBT branding on operator and directory assistance calls; moreover, without CLEC branding, CLECs do not receive the benefit of the increased customer loyalty such branding promotes.

73. SWBT must act to correct deficiencies in its LIDB process with respect to submission of initial CLEC orders. These deficiencies are a significant gating issue to MCI WorldCom's ability to expand service to full commercial volumes.

2/ SWBT had previously informed MCI WorldCom that branding would be updated 24-48 hours after the order was completed. McMillon & Sivori Decl. ¶ 87 & att. 8. In reality, branding in particular, and LIDB updates generally, should occur simultaneously with completion of the order.

74. In addition, SWBT must implement an LSR process for transmitting LIDB updates subsequent to initial orders, as all other BOCs have done. SWBT continues to provide CLECs with a choice of fundamentally flawed processes for the frequent task of updating LIDB subsequent to initial orders. Whenever a customer wants to change his or her PIC, a CLEC must fax the change, rely on a graphical user interface (GUI), or write an additional software interface to transmit the LIDB update (a significant development process that would be a waste of resources since SWBT ostensibly intends to provide an LSR process in December). MCI WorldCom is using the GUI process. This process requires dual data entry – it forces CLECs to enter the order information in their own systems as well as into the GUI, rather than simply pulling the customer's existing record in their system and populating the relevant information on an LSR with whatever changes are requested by the customer. Moreover, no status information is returned via the GUI process. CLECs do not receive FOCs or rejects telling them whether the order had been accepted. Finally, this process cannot be used at all until a customer's initial order has been completed. Indeed, it may be unavailable for longer than that. As explained above, on a high percentage of orders, MCI WorldCom has been denied access to LIDB days after receiving completion notices on the orders.

75. The defects in this process are extremely important given that it will be used to transmit a high volume of LIDB updates. In New York, MCI WorldCom transmits thousands of PIC changes per month, not even counting other LIDB updates. We previously explained that MCI WorldCom was receiving approximately 1,500 PIC changes per month at a time when its customer base is far smaller than it is today. McMillon & Sivori Decl. ¶ 89 MCI

WorldCom is presently receiving six thousand to eight thousand requests for LIDB changes per month in New York. As a result of SWBT's defective processes, MCI WorldCom has hired three additional employees simply to oversee LIDB updates at non-commercial volumes. To enable CLECs to update LIDB efficiently, and thereby have a fair opportunity to compete, SWBT must implement an LSR process for LIDB updates subsequent to initial CLEC orders.

76. SWBT ostensibly intends to implement the LSR process in December but it has delayed release of the requirements for this process. It has also delayed walking through with CLECs the LIDB process flow that would help provide some explanation as to how the LIDB process works in SWBT's back-end systems.

IV. SWBT CONTINUES TO HAVE A DEFECTIVE PROCESS FOR RELATING ORDERS

77. In our prior declarations, we discussed SWBT's failure to provide a process for CLECs to ensure that multiple orders for a single customer are processed at the same time by relating orders -- at least when these orders are MOGable. McMillon & Sivori Decl. ¶¶ 137-45; McMillon, Sivori & Lichtenberg Reply Decl. ¶¶ 42-45. We have also discussed the fact that although SWBT claims to relate orders that are not MOGable, it is not clear that SWBT relates these orders all the way through to provisioning. McMillon & Sivori Decl. ¶ 139. Moreover, its process for relating these orders can lead to a vicious cycle of rejects. Id. ¶¶ 140-41. SWBT has not done anything to correct these deficiencies and does not even mention them in its present application. Once again, these deficiencies

are easily correctable, and, indeed, do not exist with other BOCs such as Bell Atlantic. Id. ¶¶ 138, 142.

V. SWBT'S HOURS OF OPERATION ARE TOO LIMITED.

78. SWBT also does not address, and has not changed, the limited hours that its systems are available. McMillon & Sivori Decl. ¶¶ 225-29. These limited hours reduce the efficiency with which MCI WorldCom and other CLECs can correct rejects and preclude CLECs from submitting trouble tickets for customers who experience problems late at night.

79. Moreover, despite repeated questions from MCI WorldCom, SWBT has not provided any assurance that it maintains a "basket" capable of holding any significant number of orders submitted during off-hours. As a result, MCI WorldCom has been shutting down its ordering process well before SWBT's processes shut down in order to make sure that all orders in MCI WorldCom's queue are transmitted to SWBT while its systems are still up. Otherwise, the orders could reach SWBT and be lost.

80. MCI WorldCom has submitted a change request asking for extended hours. To date, SWBT has not promised any action in response to this request.

VI. SWBT REJECTS TOO MANY ORDERS, MANUALLY PROCESSES TOO MANY REJECTS, AND RETURNS THOSE REJECTS BELATEDLY.

81. SWBT's own data show that it continues to reject a high number of orders -- more than 30% of orders submitted electronically in November through March. This high rate of rejects continues even though in January, SWBT began returning jeopardies instead of rejects for orders that error out after being distributed in SORD. This change should have reduced the rate of rejects even if CLECs and SWBT were making the same number of

errors. The fact that it did not do so significantly suggests that the "real" number of rejects has actually increased.

82. To date, during its launch, MCI WorldCom is experiencing an even higher rate of rejects than CLECs generally, with many rejects attributable to errors connected with service addresses. Forty seven percent of the transactions MCI WorldCom is sending to SWBT are being rejected. Of the rejects, sixty percent are attributable to address errors. The address errors include both "invalid address" and "end user name/TN/address do not match."

83. SWBT argues that CLECs are to blame for the high reject rate. However, SWBT's failure to provide fully parsed CSRs, inconsistencies between its pre-ordering and ordering requirements, database mismatches, and defective process for relating orders all almost certainly contribute to this high reject rate. SWBT touts one CLEC as having successfully reduced rejects to a low level, but even this CLEC only reduced rejects to 13.5% and did so for just a single month. Ham Supp. Aff. ¶ 2. That CLEC experienced a much higher reject rate in other months.

84. MCI WorldCom believes that SWBT's Service Address Proposal will decrease rejects on migration orders, which is a key reason MCI WorldCom has sought the proposal. But the effects of that proposal are not yet certain. As explained above, CLECs will still have to submit addresses on some orders, and, even when they do not, database mismatches can still cause problems connected to addresses. As for SWBT's claim that CLECs can reduce rejects by pre-programming due date information, Ham Supp. Aff. ¶ 44, the due date problem could be reduced, at least with respect to due dates CLECs entered

incorrectly on their initial orders, if SWBT showed its pre-ordering and ordering interfaces were integratable with respect to due dates.

85. In any case, no matter who is to blame for the high rate of rejects, SWBT exacerbates the effect of these rejects by processing too many of them manually. SWBT's monthly performance data show that it processed more than 32% of rejects manually in November through March. This is far too high. Manual processing of rejects significantly delays return of these rejects even when SWBT meets the performance standard, because that standard is 5 hours for manually processed rejects in contrast to 1 hour for electronically processed rejects. Moreover, SWBT has not met the 5 hour standard in any month either with respect to percentage of rejects returned in 5 hours or with respect to mean time of return. The timeliness of SWBT's return of manually processed rejects is likely to deteriorate further with significantly increased volumes, as is generally true for manual processes.

86. SWBT must increase the number of rejects it processes electronically. Until it does so, there is a significant risk of severe deterioration in performance especially if present reject rates continue.

VII. SWBT MANUALLY PROCESSES TOO MANY ORDERS

87. SWBT also relies too much on manual processing of orders that it accepts. It has not made any systems changes to enhance flow through since its prior section 271 application in January. Thus, key order types, including all supplemental orders to correct manually processed rejects, most partial migration orders, all suspend and restore and hot cut orders do not flow through. The manual processing of supplemental orders to correct manually

processed rejects is a particular problem because it further delays processing of orders that have already been delayed. SWBT takes many hours to return the rejects; it inherently takes the CLEC time to determine how to correct the order and re-transmit it, and then SWBT further delays the order by manually processing it.

88. In addition, SWBT's list of the types of orders that will flow through is apparently not entirely accurate. One MCI WorldCom order recently was migrated to AT&T rather than MCI WorldCom. SWBT explained this by stating that the order included a three-way calling feature which made the order non-MOGable. The SWBT representative who manually processed the order erroneously migrated the customer to AT&T. This would not have happened, according to SWBT, if the order had been place after April 11, because at that point three-way calling became MOGable.

89. This example demonstrates several different problems. First, SWBT had never previously stated that three-way calling is non-MOGable. As we have previously explained, in New York, a thorough audit was conducted to determine all order types that fall out for manually processing; Bell Atlantic's unverified list was not accepted at face value, as are SWBT's claims in Texas. The audit determined that many orders were falling out for reasons not included on Bell Atlantic's list. We explained that a similar audit has never been conducted of SWBT orders. Second, the erroneous migration of the customer to AT&T further emphasizes the continued danger of reliance on high levels of manual processing. Third, SWBT's ostensible April 11 change to make three-way calling MOGable was done without any notice to CLECs. SWBT must notify CLECs of such changes so that they can better understand what will happen with their orders.